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Monica Fuentes

Loevy & Loevy

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2 attachments



Ps Response to Municipal Ds INT1.docx

34K



Ps Response to Municipal Ds RFP .docx

33K

Mark Loevy-Reyes <mark@loevy.com>

Wed, Aug 19, 2020 at 2:29 PM

To: Monica Fuentes <monica@loevy.com>

thanks, Monica. You're the best!

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Mark Loevy-Reyes <mark@loevy.com>

Thu, Aug 27, 2020 at 9:04 AM

To: "Jenness, Kerry" <KJenness@lowellma.gov>

Cc: "tara@loevy.com" <tara@loevy.com>, "spence@loevy.com" <spence@loevy.com>, "steve@loevy.com" <steve@loevy.com>, "margaret@loevy.com" <margaret@loevy.com>, "JBurke@timburkelaw.com" <JBurke@timburkelaw.com>, "burkejared@gmail.com" <burkejared@gmail.com>, "Moeser, Stacie" <SMoeser@lowellma.gov>, "Hucksam Jr, John R." <jhucksam@lowellma.gov>, "O'Connor, Christine" <CO'Connor@lowellma.gov>, "Gettings, Celine" <cgettings@lowellma.gov>, "LaGrassa, Adam" <ALaGrassa@lowellma.gov>

Kerry--I was scheduled to have a trial in Cedar Rapids, Iowa starting on August 17, 2020 (it got moved at the last minute because of the storm damage there), so I am a little delayed in getting to this discovery. I write to request a two week extension, until September 17, 2020 to tender Plaintiff's responses. Let me know if that is acceptable. Thank you.

Also, please advise on whether you have been able to consult with your clients about scheduling remote depositions.

Thank you for your consideration.

Mark

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Jenness, Kerry <KJenness@lowellma.gov>

Thu, Aug 27, 2020 at 10:57 AM

To: Mark Loevy-Reyes <mark@loevy.com>

Cc: "tara@loevy.com" <tara@loevy.com>, "spence@loevy.com" <spence@loevy.com>, "steve@loevy.com" <steve@loevy.com>, "margaret@loevy.com" <margaret@loevy.com>, "JBurke@timburkelaw.com" <JBurke@timburkelaw.com>, "burkejared@gmail.com" <burkejared@gmail.com>, "Moeser, Stacie" <SMoeser@lowellma.gov>, "Hucksam Jr, John R." <jhucksam@lowellma.gov>, "O'Connor, Christine" <CO'Connor@lowellma.gov>, "Gettings, Celine" <cgettings@lowellma.gov>, "LaGrassa, Adam" <ALaGrassa@lowellma.gov>

Dear Mark:

Thank you for your email. We agree to extend the discovery deadline by two weeks, such that responses will be due on September 17, 2020, with the understanding that such courtesy would be extended to us in the future if needed.

As to the remote depositions, we have spoken with each of the four officers. As we anticipated, none of the officers would be able to participate in a remote video deposition. Two of the four officers do not even own a computer; one officer owns a computer but it has no video capabilities. The fourth officer is extremely uncomfortable with technology as a general matter and would not be able to operate the computer or orchestrate a video deposition; that officer, like each of the other officers, also has specific health issues that put him at increased risk for severe illness from COVID-19, so it would not be possible to have a third party go to his home to help him with the process.

We would propose revisiting these depositions in 90 days or so, to see where things stand with the pandemic and whether it might be safer at that point to schedule something in person. In the interim, we are open to remote video depositions of any third party witnesses that you wish to depose.

Thank you,

Kerry

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